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8 Attorneys for Defendant

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

12 FREIDA PRIES,	)	
13 Plaintiff,	)	CIVIL NO. 05-01431 NJV
14 v.	)	STIPULATION AND ORDER EXTENDING
15 JO ANNE B. BARNHART,	)	DEFENDANT'S TIME TO FILE
Commissioner of Social Security,	)	RESPONSE TO PLAINTIFF'S
16 Defendant.	)	MOTION FOR SUMMARY JUDGMENT
17	)	

18 IT IS HEREBY STIPULATED by and between the undersigned attorneys, subject to the  
19 approval of the Court, that defendant Commissioner may have an extension of 30 days in which to  
20 file her response to plaintiff's motion for summary judgment.<sup>1</sup> Defendant's response was due on July  
21 17, 2006, pursuant to Civil L.R.16-5. Defendant's response is now due on August 16, 2006.

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<sup>1</sup> See attached Declaration of Theophous H. Reagans..

1 This is defendant's first request.

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5 Dated: July 13, 2006

/s/  
KENNETH J. COLLINS  
Attorney for Plaintiff

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8 KEVIN V. RYAN  
United States Attorney

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11  
12 Dated: July 17, 2006

By: /s/  
SARA WINSLOW  
Assistant United States Attorney

14 PURSUANT TO STIPULATION, IT IS SO ORDERED:  
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19 Dated: 7/17/06

  
NANDOR J. VADAS  
United States Magistrate Judge

1 KEVIN V. RYAN, CSBN 118321  
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Attorneys for Defendant

8 UNITED STATES DISTRICT COURT  
9  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

12 FREIDA PRIES,

Plaintiff,

v.

14 JO ANNE B. BARNHART,  
15 Commissioner of Social Security,

16 Defendant.  
17

CIVIL NO. C-05-01431 NJV

DECLARATION OF THEOPHOUS H.  
REAGANS IN SUPPORT OF DEFENDANT'S  
REQUEST FOR EXTENSION OF TIME

18 I, Theophous H. Reagans, declare and state as follows:

19 1. I am an Assistant Regional Counsel in the Office of the General Counsel for the United  
20 States Social Security Administration ("SSA"), Region IX.

21 2. I am requesting a 30-day extension for filing Defendant Commissioner's response to  
22 Plaintiff's motion for summary judgment in order to provide further opportunity for review and analysis  
23 of this case.  
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1 I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

2 Executed in San Francisco, California on July 12, 2006.

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4 By /s/  
5 THEOPHOUS H. REAGANS  
6 Assistant Regional Counsel  
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